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select. *Held*, that the proponent was guilty of a direct contempt. *In re Merrill* (1917, N. J. Prerog.) 102 Atl. 400.

The case is interesting for the learned opinion of the Ordinary on the subject of contempts and on the jurisdiction of the Prerogative Court to punish them.

CONTEMPT—DIRECT CONTEMPTS—REFUSAL BY DRAFT BOARD TO GIVE UP COURT ROOM.—The respondent, chairman of a local draft board, was using the vice chancellor's courtroom for the physical examination of men drafted for military service, when he was informed that the vice chancellor wanted the room for the hearing of a case. The respondent declined to give up the room that day, and, although he had an hour's intermission at noon, failed to communicate with the vice chancellor. *Held*, that the respondent was guilty of contempt *facie curiae*. *In re Schmidt* (1917, N. J. Ch.) 102 Atl. 264.

The court was careful to point out that there was no conflict of authority between the state court of chancery and the federal exemption board. There were other rooms in the court house which could have been used by the board. In view of the respondent's protests of respect for the court, no punishment was inflicted.

CONSTITUTIONAL LAW—DUE PROCESS—LIEN UPON SALOON PREMISES UNDER DRAMSHOP ACT.—The defendant owned a building which he rented to a tenant for a saloon. In a prior suit the plaintiff had recovered a judgment by default against the tenant for injury to her means of support by reason of intoxicating liquor furnished to her husband at the tenant's saloon. The Dramshop Act (Ill. Rev. Stat. ch. 43, sec. 10) declared that such a judgment should be a lien upon the premises wherein the liquor was sold if the owner had rented them for the purpose of the sale of intoxicating liquor. The present suit was brought to subject the defendant's building to the lien of the judgment obtained against his tenant. The defendant contended that the enforcement of this lien would deprive him of property without due process, since the judgment had been rendered without notice to him or opportunity to defend. *Held*, that the lien was enforceable and the statute, thus applied, constitutional. *Eiger v. Garrity* (1918) 38 Sup. Ct. 298.

The court reasons that the statute in effect makes the tenant the lessor's agent, and that through this agency, voluntarily assumed by renting for saloon purposes, the landlord becomes a participant in the sales and responsible for their consequences. This is the first time the federal Supreme Court has passed upon the question. For decisions by state courts sustaining such statutes, see cases cited in *Garrity v. Eiger* (1916) 272 Ill. 127, 111 N. E. 735.

CONSTITUTIONAL LAW—DUE PROCESS OF LAW—VALIDITY OF LEGISLATION PROHIBITING "TRADING STAMPS."—A statute of Wisconsin forbade the issuing of "trading stamps" in connection with the sale of goods, subject to the exception that sellers might issue tickets redeemable only in cash for amounts stated on the faces thereof. A number of "trading stamp" firms brought actions against the appropriate state officer, asking the court to prevent the enforcement of the statute on the ground that it deprived them of liberty and property without due process of law. *Held*, that the statute was valid. *Sperry & Hutchinson Co. v. Weigle* (1917, Wis.) 166 N. W. 54.

The opinion calls attention to the great conflict of authority upon the point at issue, the tendency of the cases in the state courts until recently being to hold similar laws invalid. The decision in favor of the law is put on the sensible ground that the view of the legislature that "trading stamp" schemes are injurious to legitimate business is at least a reasonable one and hence that